

Monsanto

MONSANTO CHEMICAL INTERMEDIATES CO.

1700 South Second Street
St. Louis, Missouri 63177
Phone: (314) 622-1400

March 23, 1981

Mr. Dennis Degner
U. S. Environmental Protection Agency
Region VII
P. O. Box 15606
Kansas City, Missouri 64106

Dear Mr. Degner:

The following information is submitted to amend the existing Resource Conservation and Recovery Act notification for the Monsanto, J. F. Queeny Plant, submitted to your office November 18, 1980. As we discussed in a phone conversation of March 16, 1981, the changes that need to be communicated can be handled in this manner.

The changes consist of the following:

- (1) EPA Action 40 CFR Parts 122, 260, 264 and 265 (November 17, 1980) suspended specific rules for wastewater treatment tanks and neutralization tanks. Therefore, it is necessary to remove those units from our notification.

Change: Form 1; Map and Legend - Delete 4 (Spill Control Clarifier), 5 (Neutralization Basin) and 7 (Laboratory Separator).

Change: Form 3; Page 1, Section III - Delete T01 - 14,500,00 - U.

Change: Form 3; Attachments B, C and D - Delete 4 (Spill Control Clarifier), 5 (Neutralization Basin) and 7 (Laboratory Separator).



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- (2) Certain wastes were inadvertently omitted from the original list submitted.

Change: Form 3; Section IV, Page 3a, Line 3 - This should read: F003 - 4,400,000 - P - S01 - T03

Change: Form 3; Section IV, Attachment A, Page 3 - Include an item #64 to read: 64. Clarifier Waste 900,000 P S02.

Change: Form 3; Section IV - these wastes need to be added to the list:

U054	1,000	P	S01
U077	5,000	P	S01

- (3) Since the time of the original notification there have been unanticipated increases of certain wastes generated. Therefore, the estimated quantities need to be adjusted.

Change: Form 3; Section IV, accordingly.

U102	45,000	P	S01
U112	1,000	P	S01
U155	10,000	P	S01
U171	1,000	P	S01
U187	5,000	P	S01

- (4) The storage arrangement of a certain waste was not correct on the original form.

Change: Form 3; Section IV, Attachment A, Page 2, Item 50 - This should read: 50. Phenolic Residue 1,500,000 P S02.

For additional clarification, copies of the original forms with the changes indicated have also been included. I am sure that you can appreciate that with the amount of information requested under RCRA that some errors and oversights are inevitable.

If you have any questions, please feel free to contact me. Thank you.

Sincerely,

Kenneth M. Perica

Kenneth M. Perica
Environmental Protection Engineer

KMP:cs
Encl.